

EXHIBIT E



Christopher Lanza <cfl@lanzalaw.com>

Your "Meet and Confer" letter of 2/12/25

Richard Kibbey <kibbeylegal@gmail.com>
To: Christopher Lanza <cfl@lanzalaw.com>
Cc: Jason Wandner <jason@wandnerlaw.com>

Mon, Feb 17, 2025 at 1:13 PM

Mr. Lanza-

I have reviewed **your 2/12/25 letter** and will address your concerns:

First you claim that our witness list disclosure is untimely and has "materially prejudiced" your case- yet you offer no specifics on either point. If you have been so "prejudiced" please advise what kind of specific answer would rectify such harm.

We believe the **Judge's scheduling Order** sets the deadlines on Discovery and will continue to abide by it.

Our **expert witness summaries** are detailed, complete, and conform to the Rule. We offer nothing more.

WhatsApp discussions: I have asked my client to review your specific requests on those and expect answers by the end of this week. We will forward that material to you when we receive it.

Interrogatory responses: Answers to Questions 6,10,11,13,14,15, 23 and 24 are complete to the best of our clients knowledge. We offer nothing more.

"Empty Folders" : I have asked for more information on this issue and should have a more detailed response, hopefully by the end of the week.

Sworn signature: You are correct! Our oversight. We will have an attestation and signed page for you by the end of the week.

Answers needed for both Parties (Plaintiffs): Mr. Porter did answer, and sign the interrogatories for both Plaintiffs- please see heading on our Answer: "Plaintiffs' Answer."

Your letter also references information we provided to you on Jan 27 via the DropBox link.

Please confirm who reviewed that information before you filed your motion for "Terminating Sanctions"? We are requesting the name(s) of all individuals who assisted you in preparing or filing that motion including any attorney(s) who reviewed your motion before it was filed. We are requesting your answer by Monday Feb 24 2025.

Regards,



Richard Kibbey, Esq.

Law Office of Richard D. Kibbey, P.A.
RichardKibbey.com

416 SW Camden Avenue
Stuart, FL 34994
ph: (772)286-0023

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2/17/25, 1:25 PM Christopher E. Canza, PIA Mail - Our Mail and Paper Letter of 2/12/25

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